

*Presentment Date and Time: May 14, 2020 at 12:00 p.m.*  
*Objection Deadline: May 11, 2020 at 5:00 p.m.*

**ROSEN & ASSOCIATES, P.C.**

*Proposed Counsel to the Debtor and*

*Debtor-in-Possession*

747 Third Avenue

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Sanford P. Rosen

Paris Gyparakis

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

MARLAINA KOLLER CROES,

Debtor.

Chapter 11

Case No. 20–22239 (RDD)

**NOTICE OF PRESENTMENT OF DEBTOR’S APPLICATION TO RETAIN  
ROSEN & ASSOCIATES, P.C. AS BANKRUPTCY COUNSEL TO DEBTOR**

**PLEASE TAKE NOTICE** that Marlaina Koller Croes, the above-captioned debtor and debtor-in-possession (the “**Debtor**”), will present the annexed application dated April 28, 2020 (the “**Application**”) authorizing the employment and retention of Rosen & Associates, P.C. (“**Rosen & Associates**”) as bankruptcy counsel to the Debtor, to the Honorable Robert D. Drain, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601, for signature on **May 14, 2020 at 12:00 p.m. (prevailing Eastern Time)** (the “**Presentment Date**”).


**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Application shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall set forth with specificity the grounds therefor, and be filed with the Bankruptcy Court electronically in accordance with General Order M-399 (General

Order M-399 and the Current Guidelines – Electronic Filing Dated December 15, 2011 can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), the official website for the Bankruptcy Court) by registered users of the Bankruptcy Court’s case filing system and, by all other parties in interest, on a CD or other electronic media containing the document in .pdf format (with a hard copy delivered directly to Judge Drain’s Chambers), and served in accordance with general order M-399 upon (i) Rosen & Associates, P.C., proposed counsel to the Debtor, 747 Third Avenue, New York, NY 10017-2803, Attn.: Sanford P. Rosen, Esq.; (ii) the Office of the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, NY 10014, Attn.: Greg M. Zipes, Esq.; and (iii) all other parties-in-interest who have requested notice pursuant to Bankruptcy Rule 2002 so as to be received no later than **5:00 p.m. on May 11, 2020** (the “**Objection Deadline**”). Unless objections are received by the Objection Deadline, the relief requested by the Application may be granted without a hearing.

**PLEASE TAKE FURTHER NOTICE** that if a written objection is timely filed, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party’s obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: New York, New York  
April 28, 2020

**ROSEN & ASSOCIATES, P.C.**  
*Proposed Counsel to the Debtor*

By:   
Paris Gyparakis

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